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22 Attorneys for Defendant

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

18 SUZANNE G. SMITH,

19 Plaintiff

20 v.

21 CAROLYN W. COLVIN, Acting
22 Commissioner of Social Security,

23 Defendant.

) Case No: 2:16-cv-01284-JAD-GWF
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)
)

**JOINT STIPULATION FOR EXTENSION
OF TIME TO FILE DEFENDANT'S
CROSS-MOTION TO AFFIRM**

(First Request)
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1 Plaintiff Suzanne G. Smith (Plaintiff or Plaintiff's) and Defendant Carolyn W. Colvin,
2 Acting Commissioner of Social Security (the Commissioner), stipulate, with the approval of this
3 Court, to an extension of time for the Commissioner to file her Cross-Motion To Affirm by thirty-
4 two days from December 13, 2016 to January 12, 2017, with all other dates in this Court's Order
5 Concerning Review Of Social Security Cases extended accordingly. This is the Commissioner's
6 first request for an extension.¹

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16 There is good cause because, since Plaintiff filed her Motion For Reversal And Remand
17 (Plaintiff's Motion), counsel has been handling a large number of District Court and Ninth Circuit
18 cases in addition to this one, with three briefs due within the next nine days. Additionally, the
19 Commissioner's counsel has been out of the office on official travel for the past two days in
20 preparation for an administrative hearing that was scheduled to commence on December 14, 2016.
21 Further, counsel has had numerous other deadlines, including other District Court briefs, numerous
22 settlement conferences, and discovery occurring in an employment case. As a result, the
23 Commissioner needs additional time to properly respond to the issues Plaintiff raised in her

24
25 ¹ This Court granted the Commissioner an extension of time to answer Plaintiff's Complaint
26 because the Social Security Administration component responsible for producing the certified
administrative record had not yet provided it to counsel. That extension occurred prior to briefing.

1 Motion. Plaintiff has no objection.

3 Respectfully submitted,

4 Date: December 14, 2016

HAL TAYLOR
Esquire

6 By: /s/* Howard D. Olinsky
HOWARD D. OLINSKY
Esquire
*by email authorization on 12/14/16

8 Attorneys for Plaintiff

10 Date: December 14, 2016


DANIEL G. BOGDEN
United States Attorney
BLAINE T. WELSH
Chief, Civil Division

13 By: /s/ April A. Alongi
APRIL A. ALONGI
Special Assistant United States Attorney

15 Attorneys for Defendant

20 IT IS SO ORDERED.

23 DATE: December 15, 2016


THE HONORABLE GEORGE FOLEY, JR.
United States Magistrate Judge

DEFENDANT'S CERTIFICATE OF SERVICE

I certify that I caused the Joint Stipulation For Extension Of Time To File Defendant's Cross-Motion To Affirm (First Request) to be served, via CM/ECF notice, on:

HOWARD D. OLINSKY
holinsky@windisability.com

Date: December 14, 2016

DANIEL G. BOGDEN
United States Attorney
BLAINE T. WELSH
Chief, Civil Division

By: /s/ April A. Alongi
APRIL A. ALONGI
Special Assistant United States Attorney

Attorneys for Defendant